

Exhibit 1 to the Complaint

U.S. Patent No. US 8,295,458 v. Verizon

Exhibit 1 to the Complaint

1. Claim Chart

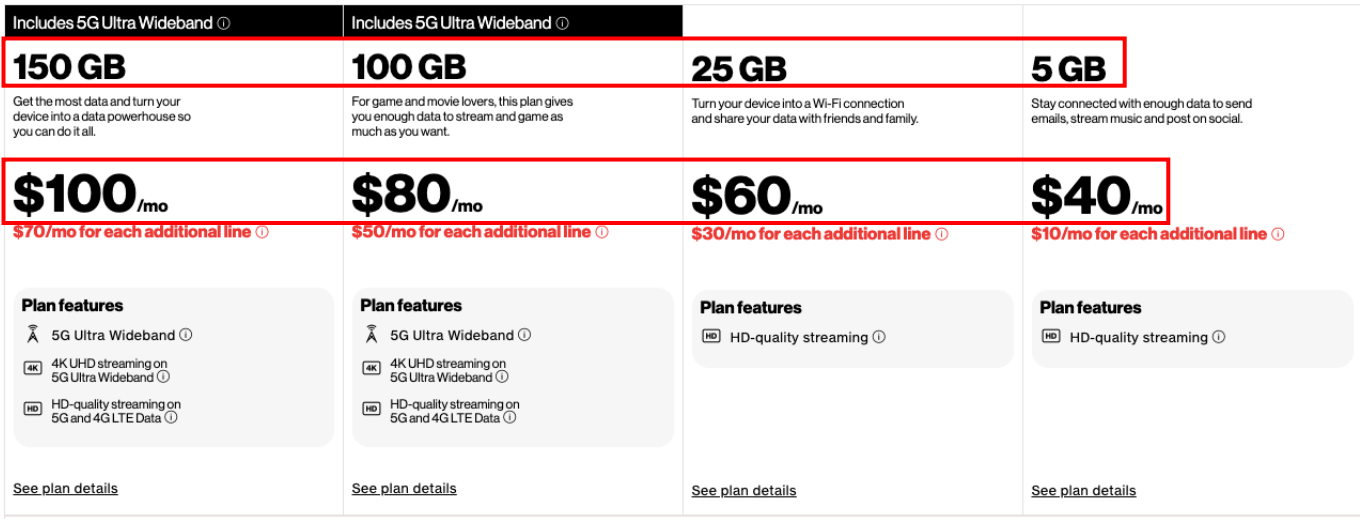
Claim	Analysis
[1.P] A computer-implemented method for providing pay-as-you-go internet services to a user comprising:	<p>Verizon (“Company”) performs and/or induces others to perform a computer-implemented method for providing pay-as-you-go internet services to a user.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides multiple data plans (150 GB, 100 GB, and 5 GB) for users and also provides a billing system where a user pays a fixed monthly amount for a fixed amount of data plus overage charges for any additional data (“pay-as-you-go internet services”) used by the user, along with other charges such as activation fees, and upgrade fees.</p>  <p>Source: https://www.verizon.com/prepaid/data-only-plans/</p>

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	<ul style="list-style-type: none"> ▫ <u>Activation fee</u> ▫ <u>Upgrade fee</u> ▫ <u>Device payment</u> - if you paid off your agreement early you see the payment as a credit. ▫ <u>Overage charges</u> - if you exceeded your plan's allowance for minutes, text or data usage. ▫ Charges for phone use overseas if you didn't add an international plan. ▫ Credits we owe you (e.g., if you overpaid your previous bill, moved to a lower-priced plan, got a promotional discount, etc.). ▫ Verizon surcharges, taxes and governmental charges for the above. <p>Source: https://www.verizon.com/support/view-bill-online-faqs/#viewpastbills</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.1] assigning an account identifier for a pay-as-you-go internet service to a user for conducting one or more online transaction via a web server, wherein said one or more online transaction requires the user's account identifier;</p>	<p>Company performs and/or induces others to perform the step of assigning an account identifier for a pay-as-you-go internet service to a user for conducting one or more online transactions via a web server, wherein said one or more online transactions requires the user's account identifier.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Verizon allows users to create an account with a unique Verizon ID ("account identifier") such as the user's mobile phone number. Further, upon choosing the data plan, the chosen plan is linked with the unique Verizon ID, and all the services availed by the user ("online transactions via a web server") are completed under the user's Verizon ID ("said one or more online transactions requires the user's account identifier").</p>

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Make a Payment









Never forget a payment again, enroll in Auto Pay and Paper Free Billing today!
Select one of the options below to verify your account.

Account identifier

Sign In with My Verizon User ID & Password

Account no. and billing zip code

Source: <https://www.verizon.com/support/pay-bill-faqs/> (annotated)

Includes 5G Ultra Wideband ⓘ	Includes 5G Ultra Wideband ⓘ		
150 GB	100 GB	25 GB	5 GB
Get the most data and turn your device into a data powerhouse so you can do it all.	For game and movie lovers, this plan gives you enough data to stream and game as much as you want.	Turn your device into a Wi-Fi connection and share your data with friends and family.	Stay connected with enough data to send emails, stream music and post on social.
\$100 /mo	\$80 /mo	\$60 /mo	\$40 /mo
\$70/mo for each additional line ⓘ	\$50/mo for each additional line ⓘ	\$30/mo for each additional line ⓘ	\$10/mo for each additional line ⓘ
Plan features  5G Ultra Wideband ⓘ  4K UHD streaming on 5G Ultra Wideband ⓘ  HD-quality streaming on 5G and 4G LTE Data ⓘ	Plan features  5G Ultra Wideband ⓘ  4K UHD streaming on 5G Ultra Wideband ⓘ  HD-quality streaming on 5G and 4G LTE Data ⓘ	Plan features  HD-quality streaming ⓘ	Plan features  HD-quality streaming ⓘ
See plan details	See plan details	See plan details	See plan details

Source: <https://www.verizon.com/prepaid/data-only-plans/>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

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[1.2] providing the user with an interface to log in using the account identifier;

Company performs and/or induces others to perform the step of providing the user with an interface to log in using the account identifier.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, after creating the account, the user logs in to the Verizon interface using the Verizon ID or mobile number.

interface to log in
using the account
identifier

Source:

<https://secure.verizon.com/signin?session=n&goto=https%3A%2F%2Fwww.verizon.com%2Fpayment%2F>
(annotated)

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	Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.
[1.3] monitoring data associated with the account identifier, during each instance of use of the pay-as-you-go internet service;	<p>Company performs and/or induces others to perform the step of monitoring data associated with the account identifier, during each instance of the use of the pay-as-you-go internet service.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the company provides the My Verizon Data Widget that regularly monitors the data used by the user during his current billing cycle. Therefore, it would be apparent to a person having ordinary skill in the art that, the usage of the data is monitored during each instance of use of the pay-as-you-go internet service. Further, based on the usage of the data services, a monthly bill is generated that includes one-time charges, overage charges, plan charges, devices, services & perks, surcharges, and taxes.</p> <p>The My Verizon Data Widget – Monitors how much data you're using in your current bill cycle. View our videos for steps to install the widget for <u>Android™</u> or <u>iOS</u> devices.</p> <p>Source: https://www.verizon.com/support/data-usage-faqs/#:~:text=The%20My%20Verizon%20Data%20Widget,these%20in%20your%20contact%20list.</p> <p>You can View by line or View by plans & devices.</p> <ul style="list-style-type: none"> • In either view, you see all your charges, they're just grouped differently. • Charges can include: plans, devices, Serices & Perks, surcharges & taxes. <p>Source: https://www.verizon.com/support/mobile-bill-updates/</p>

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	<ul style="list-style-type: none"> ▫ <u>Activation fee</u> ▫ <u>Upgrade fee</u> ▫ <u>Device payment</u> - if you <u>paid off your agreement early</u>, you see the payment as a credit. ▫ <u>Overage charges</u> - if you exceeded your plan's allowance for minutes, text or data usage. ▫ Charges for phone use overseas if you didn't add an international plan. ▫ Credits we owe you (e.g., if you overpaid your previous bill, moved to a lower-priced plan, got a promotional discount, etc.). ▫ Verizon surcharges, taxes and governmental charges for the above. <p>Source: https://www.verizon.com/support/view-bill-online-faqs/#viewpastbills</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
[1.4] comparing the monitored data to a threshold of use for the account identifier previously set by the user;	<p>Company performs and/or induces others to perform the step of comparing the monitored data to a threshold of use for the account identifier previously set by the user.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the user exceeds the plan's allowance ("threshold") for data usage, the monthly bill includes the overage charges. Since the bill includes the overage charges, upon information and belief, the monitored data usage is compared to the amount of data allowed to be used in the data plan.</p>

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[1.5] preventing the account identifier from exceeding the threshold of use;	<p>Company performs and/or induces others to perform the step of preventing the account identifier from exceeding the threshold of use.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after choosing the data plans, if the user exceeds the pre-defined data limit, overage charges for the extra data used by the user, are applied. Therefore, it would be apparent to a person having ordinary skill in the art that Verizon prevents the user having the unique Verizon ID from exceeding the threshold of use.</p>

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[1.6] providing the user with a virtually simultaneously notification of total charges associated with the account identifier when each of the one or more online transaction ends; and	<p>Company performs and/or induces others to perform the step of providing the user with a virtually simultaneously notification of total charges associated with the account identifier when each of the one or more online transactions ends.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Company provides a My Verizon app that generates a detailed summary of the monthly bill and notifies the user through an email, push notification, and text message. Therefore, it would be apparent to a person having ordinary skill in the art that Verizon provides the user with a virtually simultaneous notification of total charges associated with the user's ID when each of one or more online transactions ends.</p>

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	<div><div>How can I view, download or print my bill history? ^</div><div>How to see your Verizon mobile bills depends on how far back you need to go:</div><div>Past 6 months: Visit your <u>Bill overview</u> page in My Verizon app or website. Then follow these steps.</div><div>My Verizon app:</div><div><ol style="list-style-type: none">1. Choose Account.2. Bill & payment history. Choose a billing period from the past 18 months.3. Choose Bill PDF to save, email or print your past bill.</div><div>My Verizon website:</div><div><ol style="list-style-type: none">1. Click on Bill & payment history.2. Choose a billing period from the past 18 months.3. View PDF.</div><div>Source: https://www.verizon.com/support/view-bill-online-faqs/#viewpastbills</div><div>Will Verizon send me reminders to pay my bill?</div><div>Yes, we send email or text message payment reminders 2 days before your due date if:</div><div><ul style="list-style-type: none">• You're registered for My Verizon website or app.• You haven't enrolled in <u>Auto Pay</u>.</div><div>Source: https://www.verizon.com/support/pay-bill-faqs/#:~:text=Checking%20account%2C%20credit%20card%2C%20debit,card%20or%20Verizon%20Gift%20Card.</div></div>
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	<p>6. Tap any of the following switches to turn on  or off  then select a notification option: → Switch must be on in order to set preferences. → Selected when black dot appears.</p> <div style="border: 2px solid red; padding: 10px; margin: 10px 0;"> <ul style="list-style-type: none"> • Billing <ul style="list-style-type: none"> □ Push notification □ Text message </div> <p>Source: https://www.verizon.com/support/knowledge-base-205636/#:~:text=You%20can%20choose%20to%20receive,via%20the%20My%20Verizon%20website.</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
<p>[1.7] presenting the user with an interactive system operable during each instance of use, to enable the user to make electronic payments for additional use of the pay-as-you-go internet service.</p>	<p>Company performs and/or induces others to perform the step of presenting the user with an interactive system operable during each instance of use, to enable the user to make electronic payments for additional use of the pay-as-you-go internet service.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after the bill is generated that includes the monthly charges, as well as overage charges ("additional use of the pay-as-you-go internet service"), the user pays the bill through multiple payment methods such as online payment, by using the My Verizon app ("an interactive system operable during each instance of use"), or the website. Further, the methods include payments through a credit card ("electronic payments") linked to the user's account.</p>

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	<p>How can I view, download or print my bill history? </p> <p>How to see your Verizon mobile bills depends on how far back you need to go:</p> <p>Past 6 months: Visit your <u>Bill overview</u> page in My Verizon app or website. Then follow these steps.</p> <p>My Verizon app:</p> <ol style="list-style-type: none">1. Choose Account.2. Bill & payment history. Choose a billing period from the past 18 months.3. Choose Bill PDF to save, email or print your past bill. <p>My Verizon website:</p> <ol style="list-style-type: none">1. Click on Bill & payment history.2. Choose a billing period from the past 18 months.3. View PDF. <p>Source: https://www.verizon.com/support/view-bill-online-faq/#viewpastbills</p>
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- Activation fee
- Upgrade fee
- Device payment - if you paid off your agreement early, you see the payment as a credit.
- Overage charges - if you exceeded your plan's allowance for minutes, text or data usage.
- Charges for phone use overseas if you didn't add an international plan.
- Credits we owe you (e.g., if you overpaid your previous bill, moved to a lower-priced plan, got a promotional discount, etc.).
- Verizon surcharges, taxes and governmental charges for the above.

Source: <https://www.verizon.com/support/view-bill-online-faqs/#viewpastbills>

How to pay**Payment methods**

Sign in to My Verizon app or website to Pay your bill.

Optional: Set up automatic monthly debits (Auto Pay).

Register for My Verizon to view, manage and pay your bill wherever, whenever you need to.

You can save and use:

- Up to 2 checking accounts
- Up to 6 credit, debit or ATM cards - Verizon Visa® Card, Visa®, MasterCard®, Discover®, American Express®, PULSE®, NYCE®, or STAR®.
- Online Banking - Easily link your bank account.

Source: <https://www.verizon.com/support/pay-bill-faqs/#:~:text=Checking%20account%2C%20credit%20card%2C%20debit,card%20or%20Verizon%20Gift%20Card.>

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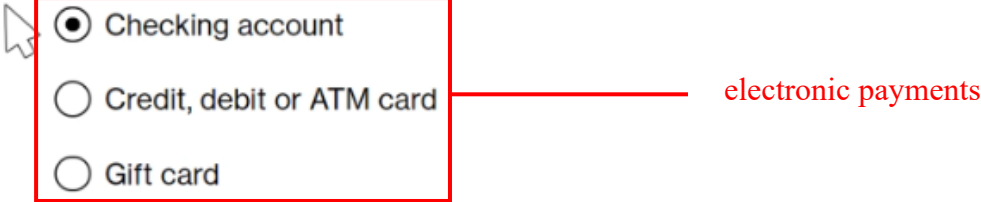
	<p>Add payment method.</p> <p>Save your preferred accounts so they're ready when you need them. You can save up to 2 checking accounts and 6 different cards.</p> <div><p><input checked="" type="radio"/> Checking account</p><p><input type="radio"/> Credit, debit or ATM card ————— electronic payments</p><p><input type="radio"/> Gift card</p></div> <p>Source: https://www.verizon.com/support/how-to-pay-your-bill-online-video/#:~:text=To%20pay%20your%20bill%20online%2C%20go%20to%20vzw.com%2F,Navigation%2C%20then%20click%20Pay%20options, at 0:31 (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
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2. List of References

1. <https://www.verizon.com/prepaid/data-only-plans/>, last accessed on 24th April, 2024.
2. <https://www.verizon.com/support/data-usage-faqs/#:~:text=The%20My%20Verizon%20Data%20Widget,these%20in%20your%20contact%20list>, last accessed on 24th April, 2024.
3. <https://www.verizon.com/support/mobile-bill-updates/>, last accessed on 24th April, 2024.
4. <https://www.verizon.com/support/view-bill-online-faqs/#viewpastbills>, last accessed on 24th April, 2024.
5. <https://www.verizon.com/support/knowledge-base-205636/#:~:text=You%20can%20choose%20to%20receive,via%20the%20My%20Verizon%20website>, last accessed on 24th April, 2024.
6. <https://www.verizon.com/support/residential/account/pay-bill/confirm-payment#:~:text=To%20confirm%20on%20the%20My%20Verizon%20website%3A,Or%20visit%20verizon.com%2Fviewbill>, last accessed on 24th April, 2024.
7. <https://www.verizon.com/support/pay-bill-faqs>, last accessed on 24th April, 2024.
8. <https://www.verizon.com/support/how-to-pay-your-bill-online-video/#:~:text=To%20pay%20your%20bill%20online%2C%20go%20to%20vzw.com%2F,Navigation%2C%20then%20click%20Pay%20options>, last accessed on 24th April, 2024.